

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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(Admitted *pro hac vice*)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

Hearing Date and Time:

May 16, 2023 at 10:00 a.m.

DECLARATION OF MARK W. RASMUSSEN

I, Mark W. Rasmussen, hereby declare under penalty of perjury:

1. I am a partner of the law firm of Jones Day, and my office is located at
2727 N. Harwood, Dallas, Texas 75201. I am a member in good standing of the Bars of the

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is
501 George Street, New Brunswick, New Jersey 08933.

State of Texas and New York. My application to appear *pro hac vice* in this case has been granted by the Court. There are no disciplinary proceedings pending against me.

2. I submit this declaration (the “Declaration”) in connection with the *Debtor’s (I) Omnibus Response to Objections to Debtor’s Confidentiality Designations and (II) Objection to Motion to De-Designate Exhibit A of the Term Sheet* filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Attached hereto as **Exhibit A** is a true and correct copy of an email dated April 13, 2023 in which counsel for the TCC confirmed the agreement to abide by the Protective Order from Debtor’s first bankruptcy, In re LTL Mgmt. LLC, No. 21-30589 (MBK) (Bankr. D.N.J.) [Dkt. 948].

4. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the April 16, 2023 deposition of James Murdica.

5. Attached hereto as **Exhibit C** is a true and correct copy of the form of non-disclosure agreement produced at bates number LTLMGMT-00002680-83.

6. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the April 17, 2023 deposition of Mikal Watts.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 15, 2023

Respectfully submitted,

/s/ Mark W. Rasmussen
Mark W. Rasmussen